

(Caption of Case)
IN THE MATTER OF:

Petition of Seven Bridges Communications, LLC for the Designation as an Eligible Telecommunications Carrier

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET

NUMBER: 2007 - 167 - C

Submitted by: Robert E. Tyson, Jr.

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ **Emergency Relief demanded in petition** ☐ **Request for item to be placed on Commission's Agenda expeditiously**

☐ **Other:**

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

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IN THE MATTER OF:

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LLC for the Designation as an Eligible
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**MOTION TO BE RELIEVED
AS COUNSEL**

Robert E. Tyson, Jr. and Sowell Gray Stepp & Laffitte, LLC (collectively “Sowell Gray”) hereby move for the Public Service Commission of South Carolina (“Commission) to issue an Order relieving Sowell Gray as counsel for Seven Bridges Communications, LLC (“Seven Bridges”) in the above referenced docket, pursuant to Rule 1.16(b)(5), “Declining or Terminating Representation,” part of Rule 407, “Rules of Professional Conduct” of the South Carolina Appellate court Rules. That Rule reads as follows, “a lawyer may withdraw from representing a client if: . . . (5) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer’s services or payment therefore and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled. . . .”

Since the Commission held this matter in abeyance, Seven Bridges has failed to participate with counsel in this matter. Without Seven Bridges’ participation and communication, counsel cannot proceed adequately on Seven Bridges’ behalf.

Sowell Gray was engaged by Seven Bridges in June of 2007. Shortly after engaging Sowell Gray, Seven Bridges requested that Sowell Gray file a Motion to Hold Petition in Abeyance on Seven Bridges’ behalf. On July 31, 2007, the Commission issued an Order Holding Petition in Abeyance for 180 days. The Abeyance expired on

January 25, 2008. Prior to January 25, 2008, counsel attempted to communicate with Seven Bridges concerning future action in this docket. Seven Bridges has not responded to any communication by Sowell Gray.

On January 14, 2008, Sowell Gray received a notice from the Commission regarding testimony due dates and a hearing date. Since receiving these notices Sowell Gray has attempted further to contact Seven Bridges via telephone, facsimile, email, Certified U.S. Mail and FedEx. Seven Bridges has not responded to any of Sowell Gray's communication efforts.

Sowell Gray has given reasonable warning to Seven Bridges that it intends to withdraw as counsel for Seven Bridges due to Seven Bridges' lack of communication and involvement in this matter.

Counsel is therefore requests an Order immediately relieving Sowell Gray as counsel for Seven Bridges.

WHEREFORE, for the reasons set above, Robert E. Tyson, Jr. and Sowell Gray Stepp & Laffitte, LLC move this honorable Commission for an Order relieving Sowell Gray as counsel for Seven Bridges.

SOWELL GRAY STEPP & LAFFITTE, LLC

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February 25, 2008